

WILLKIE FARR & GALLAGHER_{LLP}

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111

October 31, 2023

VIA FEDEX AND ECF

Honorable Paul A. Crotty
United States District Court, Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007
CrottyNYSDChambers@nysd.uscourts.gov

Re: Approval of Notice of Voluntary Dismissal
Caballero v. Fuerzas Armadas Revolucionarias de Colombia, et al., No. 1:20-mc-00249

Dear Judge Crotty:

We write on behalf of LDC Supply International, LLC (“LDC”) to request that the Court so-order Plaintiff’s Notice of Voluntary Dismissal (ECF No. 105) dismissing this action without prejudice against LDC, and order that the attached writ of execution dated March 10, 2021, be vacated. Plaintiff does not oppose this request.

Plaintiff filed the Notice on August 10, 2023. ECF No. 105. On August 11, 2023, the Clerk of Court referred the Notice to the Court because it had been filed in a “closed” case. *See* Docket Entry of Aug. 11, 2023. Although a notice of voluntary dismissal filed pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) is ordinarily “self-executing and effective immediately,” *Alix v. McKinsey & Co.*, 470 F. Supp. 3d 310, 317 (S.D.N.Y. 2020), the parties believe that it would be advisable, out of an abundance of caution, for the Court to so-order the Notice and order (1) that Plaintiff’s action is dismissed pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), and (2) that the March 10, 2021 writ of execution attached to the Notice as Exhibit A be vacated.

Hon. Paul A. Crotty
October 31, 2023
Page 2

The undersigned is authorized to state that Plaintiff does not oppose this request. For the Court's convenience, we have attached a copy of the Notice and its accompanying Exhibit A, along with a separate proposed order.

Respectfully submitted,

s/ Samuel Hall
Samuel Hall
WILLKIE FARR & GALLAGHER LLP
1875 K Street, N.W.
Washington, DC 20006-1238
(202) 303-1443
shall@willkie.com

Counsel for LDC Supply International, LLC